

June 5, 2008

US Army Corps of Engineers
Headquarters
Attn: Principles & Guidelines Revisions
CECW-ZA
441 G Street, NW
Washington, DC 20314-1000

***RE:** Recommended Revisions by the American Shore & Beach Preservation Association to the Principles and Guidelines of US Army Corps of Engineers.*

The American Shore & Beach Preservation Association (ASBPA) is pleased to offer the US Army Corps of Engineers (Corps) the following comments for the record of June 5, 2008 regarding recommendations for the revision of the Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies, dated March 10, 1983, known commonly as the Principles & Guidelines (P&G).

Founded in 1926, the American Shore and Beach Preservation Association represents the scientific, technical and political interests along the coast in an effort to shape national research and policy concerning shore and beach management and restoration. The group strives to engage in factual debate on coastal issues and economics that will foster sound, far-sighted and economical development and preservation of our beaches; thereby aiding in placing their benefits within the reach of the largest possible number of people in accordance with the ideals of a democratic nation.

ASBPA has a long and successful history of working with the Corps to develop and implement policies, projects, and programs that advance the Corps Civil Works mission, as well as reflect the Association's goals to preserve the nation's coasts. A key element in this joint effort has been the P&G as the basic foundation for many of the Corps efforts. While ASBPA feels that there is definitely room for improvement to the P&G, the Association also feels that it is necessary to recognize that the effectiveness of the P&G in its current form has permitted the federal government and non-federal projects sponsors to partner on important projects that reflect the interests of the nation and of local/regional stakeholders. The P&G has established a clear set of parameters for determining project worthiness, but allows for enough flexibility for formulation of projects that provide for economic, environmental, recreational, and National Economic Development benefits. It is ASBPA's hope that the proposed revisions maintain this balance between set parameters and flexibility.

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As the Corps moves forward with revisions, ASBPA recommends that the initial phase of the effort focuses on the standards that underlie water resource planning for Corps civil works projects. Once changes in the standards that support the principles component of the current P&G are adopted, changes in guidelines and procedures for implementing those standards can be discussed.

Recommendation #1: Watershed/Regional Management Approach

- The current Civil Works Strategic Plan, which has been endorsed by OMB, embodies a watershed approach. The P&G should be revised to reflect this approach.

Discussion: Regional (or watershed) management is a systems approach to formulating and managing water resources projects. It applies to the planning and design of projects as well as their construction, operation, and maintenance. To oversimplify, if we have Beach A next to Navigation B, suitable sand dredged from B should be placed on Beach A rather than disposed offshore. Assuming Beach A needs the sand and the sand is compatible, a regional sediment management plan would seek to combine the need for the channel to be dredged with the need of the beach to be nourished with sand. Planning projects by region facilitates collaboration with state and local governments as well as other stakeholders. It encourages opportunities to improve the effectiveness of projects, reduce their long-term cost, and integrate projects that otherwise would be treated as disparate elements of different Corps business programs.

ASBPA has been a leader in promoting the regional sediment management approach. Nevertheless, we caution that studies using this approach that do not result in supportable projects will undermine the watershed/regional management approach.

Recommendation #2: Collaborative Approach

- Establish collaboration with non-federal sponsors, other federal agencies, state agencies, local governments, and tribes as the norm in the formulation of water resources projects

Discussion: Different perspectives and a more comprehensive discussion and evaluation of complex problems, interrelated concerns, and potential projects are more likely to occur with a collaborative approach. In addition to the public stakeholders, private organizations and private stakeholders should be included in the collaborative process, as appropriate. In addition, the Corps should take advantage of its unique planning capabilities to move beyond just the Corps interest, and embrace solutions that reflect the full range of the national federal interest (the collection of all responsibilities assigned to federal agencies). This collaborative approach is embodied in EC 1105-2-409 and should be strongly encouraged, especially for the complex studies with multiple issues and needs, in the revised P&G.

Both the watershed and collaborative approach recommendations add time and cost to the planning process. While these factors cannot be addressed in the revised P&G, federal policy makers need to provide the funding to enable the watershed and collaborative approaches.

Recommendation #3: Multi-Objective Plan Formulation

- Projects should be formulated to maximize all national and regional economic development benefits, environment benefits, and social benefits (with an emphasis on public safety).
- Such formulation should be based on the standards set forth in the revised P&G without regard for Administration budgetary policy.

Discussion: The current P&G includes four accounts to be used in evaluating water resources projects (National Economic Development, Environmental Quality, Regional Economic Development, and Other Social Effects). However, the current P&G formulates projects for the single purpose of maximizing net national economic development benefits. ASBPA recommends that the revised P&G build on longstanding congressional policy as well as the needs of our contemporary society and require that all appropriate national benefits be included in the formulation of water resource projects. For instance, shore protection projects should be formulated to maximize all national benefits on an equal basis, including recreation benefits, environmental benefits, as well as public safety benefits, and other social benefits. The optimized plan should be identified and provided to Congress. The Administration could recommend a lesser plan for congressional authorization, based on Administration budgetary policy. However, Congress would have the opportunity to authorize the more comprehensive plan with greater net benefits to the Nation.

ASBPA notes that the Corps currently formulates projects based on their consistency with the Administration's budgetary policy. For example, the Federal Water Project Recreation Act of 1965 states that it is the policy of Congress to include outdoor recreation in the planning of all types of federal water resources projects.¹ The 1946 statute that forms the basis for the federal beach nourishment program states that its two purposes are "to prevent damages to shores and beaches" and "promote and encourage the healthful recreation of the people²." In addition, the P&G recognizes recreation benefits as national economic development benefits while giving equal consideration to all these national benefits. However, for periodic nourishment projects, Administration policy requires formulation for storm damage reduction and limits the consideration of recreation benefits to no more than 50 percent of the national economic development benefits needed to justify a project. Once it is determined that storm damage reduction benefits provide greater than 50 percent of project justification, then all incidental recreation benefits are included. It is budgetary policy which prohibits the Corps from formulating for all national economic development purposes and including separable recreation benefits in its shore protection project recommendations to Congress. Administration policy and not the current P&G impose this artificial limit. We recommend the revised P&G clarify the distinction between its guidelines and whatever budgetary policies may be adopted by an Administration.

In addition, given the difficulties in assessing the weight which should be given to some project purposes, ASBPA recommends that the revised P&G permit flexibility in evaluating those

¹ 18 USC 4601-12

² 33 USC 426(e)(a)

purposes but continue to require full disclosure of any risks and uncertainties that may be associated with the proposed project plan. Additionally, water resources projects are formulated using various models which predict project outputs such as environmental benefits. Actual outputs must be carefully monitored to assure they are realized. Inasmuch as the project may perform differently than predicted by the models, adaptive management should be employed periodically evaluate a project's performance and provide an opportunity for adjustments, if necessary.

Recommendation #4: Use of Certified Planning Models

- Encourage certification and use of planning models

Discussion: P&G should be revised to support the current Corps initiative to carry out a certification process to review, improve, and validate analytical tools and models for Corps business programs. The expectation is that certified models used to support planning studies in the future will be accepted by independent technical reviewers. It is ASBPA's recommendation that once acceptable planning models have been certified, non-federal sponsors will not have to participate in the costs of model development or certification for individual projects.

ASBPA appreciates the opportunity to provide comments on this important matter, and would welcome any questions or comments from the Corps.